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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**  
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12 LAURI VALJAKKA,  
13 Plaintiff,  
14 v.  
15 NETFLIX, INC.,  
16 Defendant.

Case No.: 4:22-cv-01490-JST

**[PROPOSED] ORDER GRANTING  
NETFLIX, INC.'S MOTION FOR AN  
ORDER TO SHOW CAUSE AND  
ORDERING PLAINTIFF AND HIS  
AGENTS TO SHOW CAUSE WHY  
THEY SHOULD NOT BE HELD IN  
CIVIL CONTEMPT**

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19 Pending before the Court is Defendant Netflix, Inc.'s ("Netflix's") Motion for an Order to  
20 Show Cause Why Valjakka and His Agents Shall Not Be Held in Civil Contempt for Failure to Comply  
21 With The Court's Preliminary Injunction Order.

22 IT IS HEREBY ORDERED NETFLIX'S Motion is GRANTED.

23 Valjakka, his attorneys, and agents, including the Ramey Firm and AiPi, LLC ("Agents") shall  
24 respond within ten (10) days of this Order, demonstrating cause as to why they should not be held in  
25 civil contempt for failure to follow this Court's Orders, Dkt. Nos. 176, 202, and 204. Their response  
26 must include: (1) all efforts undertaken to comply with this Court's Order, Dkt. Nos. 176, 202, 204;  
27 (2) all information necessary to ascertain when and how Mr. Valjakka was informed of the Court's PI  
28 Order, including the persons present for those conversations, the dates of those conversations, and the

1 manner of communication, e.g., Zoom, telephone or email; and (3) provide to the Court *in camera*, all  
2 communications by Valjakka and/or AiPi and/or the Ramey Firm regarding compliance with the  
3 Court’s PI Order. Further, Valjakka and his Agents are ORDERED to explain why they failed to  
4 “transmit a copy of this preliminary injunction to his licensees, and to any entity that has an interest in  
5 Enforcement Assets[.]”

6 Finally, Valjakka and his Agents must identify the location of every dollar of the Enforcement  
7 Assets and all efforts to maintain those Assets in their location pending Netflix’s trial on its CUVTA  
8 claim.

9 **IT IS SO ORDERED.**

10 Dated: \_\_\_\_\_

11 JON S. TIGAR  
12 United States District Judge  
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